

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

In re Terrorist Attacks on September 11, 2001	03 MDL 1570 (GBD/SN)
---	----------------------

This document relates to: *Estate of John P. O'Neill, Sr., et al. v. The Republic of Iraq, et al.*,  
04-cv-1706 (GBD)(SN)

**DECLARATION OF JERRY S. GOLDMAN, ESQ. IN SUPPORT OF MOTION TO ADD  
ADDITIONAL PLAINTIFFS AGAINST THE TALIBAN**

I, Jerry S. Goldman, Esq., declare under penalty of perjury, as provided for by 28 U.S.C. § 1746, that the following statements are true and correct:

1. I am a shareholder at Anderson Kill P.C., attorneys for Plaintiffs the Estate of John P. O'Neill, Sr., John P. O'Neill, Jr., Christine O'Neill, Carol O'Neill, the Estate of Dorothy O'Neill ("O'Neill Plaintiffs"); Plaintiffs added pursuant to the Court's May 4, 2022 Order (ECF No. 7949) to the Amended Complaint filed May 13, 2022, ECF No. 8017; and, the sixty-seven (67) proposed Additional Plaintiffs listed in Appendix 1 to Exhibit A, beginning at number 3,017 (collectively, "Plaintiffs") in the above-captioned action. I am familiar with the facts and circumstances of this case and am admitted to practice in this Court.

2. Attached hereto as Exhibit A is a true and correct copy of the Proposed Second Amended First Consolidated Complaint. Appendix 1 to Exhibit A, starting at number 3,017 lists the sixty-seven (67) proposed Additional Plaintiffs ("Additional Plaintiffs"). All other Plaintiffs listed on Appendix 1 were already added to the case pursuant to the Court's May 4, 2022 Order (ECF No. 7949).

3. Since filing the February 11, 2022 Motion to Add Parties, ECF No. 7654, undersigned counsel has regularly received phone calls and emails from 9/11 victims' family

members and referral counsel requesting to join the MDL and wants to ensure the sixty-seven (67) claimants who retained Anderson Kill P.C. after May 13, 2022 can join the case against the Taliban. These sixty-seven (67) claimants would join the 3000+ other 9/11 plaintiffs who have engaged Anderson Kill P.C. to represent them in this MDL.

4. As indicated in the letter dated April 18, 2022 from undersigned counsel, ECF No. 7876, Anderson Kill P.C. intends to cease accepting new 9/11 clients at the end of the spring, and does not intend to file another motion to add additional new plaintiffs into suit against the Taliban (but reserves the right to substitute parties as needed).

5. Undersigned counsel envisions that all of the above-referenced plaintiffs, including proposed Additional Plaintiffs will be included in the Framework Agreement previously described to the Court. *See* ECF No. 7790.

WHEREFORE, Plaintiffs respectfully request that the Court grant this Motion to Add Additional Plaintiffs Against the Taliban.

Dated: June 14, 2022  
New York, NY

/s/ Jerry S. Goldman

Jerry S. Goldman, Esq.  
Anderson Kill P.C.  
1251 Avenue of the Americas  
New York, NY 10020  
Email: [jgoldman@andersonkill.com](mailto:jgoldman@andersonkill.com)  
Tel: 212-278-1000  
Fax: 212-278-1733